



also rely on documents related to the recall of the Bumbo Seat that was announced by the C.P.S.C. on August 15, 2012, and the seatbelt kit that is being distributed in conjunction therewith. Plaintiffs may also rely upon documents that have been produced in other lawsuits involving similar allegations about the Bumbo Seat. In addition, Plaintiffs may rely upon excerpts from Defendants' websites. Plaintiffs will also make the subject Bumbo Seat available for inspection at a mutually convenient time and location.

Rule 26(a)(1)(A)(iii) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**RESPONSE:** (a) Past and future medical expenses of B. Hess; (b) Past pain and suffering of B. Hess (will supplement); (c) Past mental anguish of B. Hess (will supplement); (d) Past disfigurement of B. Hess (will supplement); (e) damages for the past and future mental anguish suffered by Theresa Hess (will supplement); (f) exemplary damages of no less than (\$2,000,000.00) and (g) pre-judgment and post-judgment interest as provided by law.

Rule 26(a)(1)(A)(iv). For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy judgment:

**RESPONSE:** Not applicable.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ross" followed by a stylized flourish.

**DATED: September 24, 2012**

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